

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

PROMISE HEALTHCARE GROUP, LLC, *et al.*,

Debtors.¹

PROMISE HEALTHCARE, INC., BOSSIER LAND ACQUISITION CORP., PROMISE HEALTHCARE OF LOUISIANA, INC., AND PROMISE PROPERTIES OF SHREVEPORT, LLC,

Plaintiffs,

v.

KPC PROMISE HEALTHCARE, LLC and STRATEGIC GLOBAL MANAGEMENT, INC.,

Defendants.

Chapter 11

Case No. 18-12491 (CSS)

(Jointly Administered)

Adv. Proc. No. 19-50776 (CSS)

Hearing Date: 10/8/2020 at 11:00 AM

Objection Deadline: 9/16/2020 at 4:00 P.M.

Re: Adv. Docket Nos. 49 and 50

**AMENDED NOTICE OF HEARING REGARDING DEFENDANTS' MOTION TO
COMPEL PRODUCTION OF DOCUMENTS FROM NON-PARTIES MARK TRESS,
HANCOCK WHITNEY BANK AND LEXMARK HOLDINGS LLC**

¹ The Debtors in these Chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are as follows: HLP HealthCare, Inc. (8381), PH-ELA, Inc. (9180), Professional Rehabilitation Hospital, L.L.C. (5340), Promise Healthcare #2, Inc. (1913), Promise Healthcare Group, LLC (1895), Promise Healthcare Holdings, Inc. (2601), Bossier Land Acquisition Corp. (6644), HLP of Los Angeles, LLC (9102), HLP of Shreveport, Inc. (1708), HLP Properties at The Villages Holdings, LLC (0006), HLP Properties at the Villages, L.L.C. (1938), HLP Properties of Vidalia, LLC (4255), HLP Properties, Inc. (0068), Promise Healthcare of California, Inc. (9179), Promise Healthcare, Inc. (7953), Promise Hospital of Ascension, Inc. (9219), Promise Hospital of Baton Rouge, Inc. (8831), Promise Hospital of Dade, Inc. (7837), Promise Hospital of Dallas, Inc. (0240), Promise Hospital of East Los Angeles, L.P. (4671), Promise Hospital of Florida at The Villages, Inc. (2171), Promise Hospital of Louisiana, Inc. (4886), Promise Hospital of Lee, Inc. (8552), Promise Hospital of Overland Park, Inc. (5562), Promise Hospital of Phoenix, Inc. (1318), Promise Hospital of Salt Lake, Inc. (0659), Promise Hospital of Vicksburg, Inc. (2834), Promise Hospital of Wichita Falls, Inc. (4104), Promise Properties of Dade, Inc. (1592), Promise Properties of Lee, Inc. (9065), Promise Properties of Shreveport, LLC (9057), Promise Skilled Nursing Facility of Overland Park, Inc. (5752), Promise Skilled Nursing Facility of Wichita Falls, Inc. (1791), Quantum Health, Inc. (4298), Quantum Properties, L.P. (8203), St. Alexius Hospital Corporation #1 (2766), St. Alexius Properties, LLC (4610), Success Healthcare 1, LLC (6535), Success Healthcare 2, LLC (8861), Success Healthcare, LLC (1604), Vidalia Real Estate Partners, LLC (4947), LH Acquisition, LLC (2328), Promise Behavioral Health Hospital of Shreveport, Inc. (1823), Promise Rejuvenation Centers, Inc. (7301), Promise Rejuvenation Center at the Villages, Inc. (7529), and PHG Technology Development and Services Company, Inc. (7766). The mailing address for the Debtors, solely for purposes of notices and communications, is c/o FTI Consulting, Inc., 50 California Street, Suite 1900, San Francisco, CA 94111.

PLEASE TAKE NOTICE that on August 19, 2020, the above-captioned Defendants filed a *Motion to Compel Production of Documents From Non-Parties Mark Tress, Hancock Whitney Bank and Lexmark Holdings LLC* [D.I. 49] (the “Motion”) in the United States Bankruptcy Court for the District of Delaware (the “Court”). You were previously served with a copy of the Motion.

PLEASE TAKE FURTHER NOTICE that objections, if any, to approval of the Motion must (a) be in writing; (b) be filed with the Clerk of the Bankruptcy Court, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **September 16, 2020 at 4:00 p.m. (Eastern Time)** (the “Objection Deadline”); and (c) served so as to be received on or before the Objection Deadline by the undersigned counsel to Defendants.

PLEASE TAKE FURTHER NOTICE that only objections made in writing and timely filed and received, in accordance with the procedures above, will be considered by the Court at such hearing.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE MOTION WILL BE HELD ON **OCTOBER 8, 2020 at 11:00 A.M. (EASTERN TIME)** BEFORE THE HONORABLE CHRISTOPHER S. SONTCHI, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 5TH FLOOR, COURTROOM #6, WILMINGTON, DELAWARE 19801.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: August 31, 2020
Wilmington, Delaware

BARNES & THORNBURG, LLP

/s/ Thomas E. Hanson, Jr.
Thomas E. Hanson, Jr. (No. 4102)
Kevin G. Collins (No. 5149)
1000 N. West Street, Suite 1500
Wilmington, Delaware 19801
Telephone: (302) 300-3434
Facsimile: (302) 300-3456
Email: thanson@btlaw.com
kcollins@btlaw.com

-and-

BUCHALTER, A Professional Corporation
Mary H. Rose (admitted *pro hac vice*)
Paul S. Arrow (admitted *pro hac vice*)
1000 Wilshire Boulevard, Suite 1500
Los Angeles, California 90017
Telephone: (213) 891-0700
Facsimile: (213) 896-0400
Email: mrose@buchalter.com
parrow@buchalter.com

*Attorneys for Defendants KPC Promise
Healthcare, LLC and Strategic Global
Management, Inc.*